

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

*In the Matter of:*

Auburn Post Office  
Auburn, West Virginia 26325

Docket No. A2011-94

RESPONSE OF UNITED STATES POSTAL SERVICE TO REPLY COMMENTS  
(December 27, 2011)

On November 22, 2011, the Postal Service filed its Comments in this proceeding. On December 8, 2011, the Public Representative submitted a Reply Brief. On December 15, 2011, the Auburn Town Council and the Save the Auburn Post Office Committee ("Petitioners") submitted a document entitled Rebuttal to US Postal Service Comments ("Rebuttal").<sup>1</sup> The Postal Service hereby provides further information and explanation in response to these filings.

Public Representative

The Public Representative "concludes that no persuasive argument has been presented which would prevent the Commission from affirming the Postal Service's determination to close the Auburn Post Office."<sup>2</sup> At the same time, while noting that the Postal Service's assumptions about replacement delivery service more than cover the discrepancy between assigned Post Office Boxes at Auburn and available Post Office Boxes at Troy, the Public Representative "would find it more assuring if the Postal

---

<sup>1</sup> The deadline for reply briefs in response to the Postal Service's answering brief was December 7, 2011. PRC Order No. 887, Notice and Order Accepting Appeal and Establishing Procedural Schedule, Docket No. A2011-94, September 30, 2011, at 5. The Petitioners' Rebuttal was not accompanied by a motion for late acceptance, and no reason has been given why the Commission should take it into account despite its noncompliance with the Commission's Order. Nevertheless, the instant response is premised on the eventuality that the Commission may decide, *sua sponte*, to consider the matters discussed in the Rebuttal.

<sup>2</sup> Reply Brief of the Public Representative, Docket No. A2011-94, December 8, 2011, at 2.

Service would guarantee post office box service to all Auburn box customers that wanted to continue post office box service at the Troy post office.”<sup>3</sup>

Further internal research indicates that the Troy Post Office has reserved space for general delivery items that can be converted to additional Post Office Boxes if demand warrants. The Postal Service has added a memorandum to the administrative record to clarify this point.<sup>4</sup>

### Petitioners

Among other things, the Petitioners draw attention to the fact that the Auburn community is served by both a rural carrier and a Highway Contract Route (HCR). Further internal research has resulted in clarification that replacement delivery service to the Auburn community would be provided by extension of *both* the existing rural route and the existing HCR service. Because the rural carrier is currently stationed at Troy, the only changes to the rural route would be the addition of delivery points and the elimination of the need for the driver to stop and case mail at the Auburn Post Office, which the driver would perform instead at the Troy Post Office. The HCR service originates at West Union and would have to be extended to include not only new delivery points, but also the need to travel past Auburn to Troy to pick up mail and back again to serve the route (an additional 19 miles round-trip).

The Postal Service has added a memorandum to the administrative record to clarify this point.<sup>5</sup> As explained therein, the estimated annual replacement service cost

---

<sup>3</sup> *Id.*

<sup>4</sup> United States Postal Service Notice of Filing Supplement to the Administrative Record, Docket No. A2011-94, December 23, 2011, at 3-6.

<sup>5</sup> *Id.* at 2.

is \$8,105.33 as a result. Although this is higher than the original estimate, the Postal Service will still realize significant annual savings of \$43,328.67 (=\$51,434 - \$8,105.33).

To the extent that the Postal Service's initial comments contained information contrary to this clarification, the Postal Service regrets any confusion that may have resulted.<sup>6</sup> However, the explanations herein do not alter the fundamental validity of the Postal Service's analysis and decision, as set forth in the administrative record and the Postal Service's comments. Accordingly, the Commission should still affirm the Final Determination to discontinue the Auburn Post Office.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Anthony F. Alverno  
Chief Counsel, Global Business & Service  
Development

Jacob Howley  
Attorney

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1137  
(202) 268-8917; Fax -5628  
December 27, 2011

---

<sup>6</sup> One continuing point of ambiguity is the incorporation status of Auburn. It appears that the Petitioners and the Postal Service have received conflicting information from the same third-party government office. *Compare* United States Postal Service Comments Regarding Appeal ("USPS Comments"), Docket No. A2011-94, November 22, 2011, at 10 fn.51, *with* Rebuttal at 1. Even if all concerned defer to the Petitioners on this point, the Postal Service reiterates that the incorporated status of a locale does not affect the relevant legal factors under 39 U.S.C. § 404(d). USPS Comments at 10 fn.51; Final Determination at 6; Proposal at 6.